

EXHIBIT B

Fleming, Lindsay A.

From: Fleming, Lindsay A.
Sent: Wednesday, June 30, 2021 5:39 PM
To: 'Robert Bichler'
Cc: 'Tom Quinn'; Barton, Eric; Robert Brennan
Subject: RE: Nicolette demand letter to Equifax
Attachments: Jack Nicolette- Settlement Agreement(71304110v1).DOCX; Nicolette, Jack Robert - Disclosure 6.22.21.pdf

Robert,

Attached is the draft settlement agreement and copy of Plaintiff's current disclosure. (The password is the same as the one I previously sent for the document production). If these meet with your approval, please have Mr. Nicolette sign the settlement agreement and send it back to us, along with W-9s for both Mr. Nicolette and for your firm.

Also, I can confirm that Equifax did not send an ACDV to Tesla given the nature of Plaintiff's dispute. In his dispute letter, Plaintiff stated that his "Solar City/Tesla account is not in arrears and has never had a past due balance since executing the PPA on August 5, 2015." Plaintiff stated that the information reporting was inaccurate and misrepresented the status of his Solar City/Tesla account.

Given the language in his dispute letter, the Equifax agent coded the dispute as disputes present/previous account status, payment rating, and account history. Because the Tesla account was already reporting as current with a status of "pays as agreed" with no late payments, the agent did not send an ACDV to Tesla.

Thanks,
Lindsay

From: Robert Bichler <rbichler@brennanlaw.com>
Sent: Monday, June 21, 2021 4:04 PM
To: Fleming, Lindsay A. <lafleming@seyfarth.com>
Cc: 'Tom Quinn' <tquinn@nokesquinn.com>; Barton, Eric <EBarton@seyfarth.com>; Robert Brennan <rbrennan@brennanlaw.com>
Subject: RE: Nicolette demand letter to Equifax

[EXT. Sender]

Lindsay, Thank you. Let us know.

Robert Bichler
Senior Paralegal

Robert F. Brennan, Esq.
Law Offices of Robert F. Brennan, APC
2103 Montrose Ave. Suite D
Montrose, Ca. 91020

(818) 249-5291
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- FALSE INFORMATION ON CREDIT REPORTS.
- LEMON LAW AND CAR DEALER FRAUD CASES.
- ELDER FINANCIAL ABUSE.
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- FALSE INFORMATION ON EMPLOYMENT OR APARTMENT BACKGROUND REPORTS.
- INSURANCE BAD FAITH.
- GENERAL BUSINESS AND COMMERCIAL LITIGATION.
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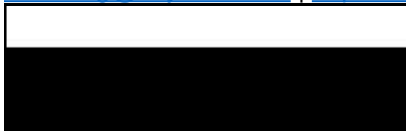
From: Fleming, Lindsay A. <laflaming@seyfarth.com>
Sent: Monday, June 21, 2021 12:57 PM
To: Robert Bichler <rbichler@brennanlaw.com>
Cc: 'Tom Quinn' <tquinn@nokesquinn.com>; Barton, Eric <EBarton@seyfarth.com>; Robert Brennan <rbrennan@brennanlaw.com>
Subject: RE: Nicolette demand letter to Equifax

Robert,

Thank you for your patience. As you may have seen, I was out of the office at a deposition on Friday and busy preparing when you emailed on Thursday afternoon. I am waiting to hear back from Equifax regarding the ACDV and will let you know as soon as I confirm what happened.

Thanks,
Lindsay

Lindsay A. Fleming | Counsel | Seyfarth Shaw LLP
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From: Robert Bichler <rbichler@brennanlaw.com>

Sent: Monday, June 21, 2021 1:25 PM

To: Fleming, Lindsay A. <laflaming@seyfarth.com>; Robert Brennan <rbrennan@brennanlaw.com>; Barton, Eric <EBarton@seyfarth.com>; 'Tom Quinn' <tquinn@nokesquinn.com>

Subject: RE: Nicolette demand letter to Equifax

[EXT. Sender]

Second nudge. No ACDV form in documents sent in Nicolette. Please check on this.

Robert Bichler
Senior Paralegal

Robert F. Brennan, Esq.
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From: Robert Bichler

Sent: Friday, June 18, 2021 10:50 AM

To: Fleming, Lindsay A. <laflaming@seyfarth.com>; Robert Brennan <rbrennan@brennanlaw.com>; Barton, Eric <EBarton@seyfarth.com>; 'Tom Quinn' <tquinn@nokesquinn.com>

Subject: RE: Nicolette demand letter to Equifax

Nudge,

Please see below. We did not see any ACDV in the Nicolette's documents you sent us.

Regards,
Robert Bichler
Senior Paralegal

Robert F. Brennan, Esq.
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From: Robert Bichler

Sent: Thursday, June 17, 2021 2:39 PM

To: Fleming, Lindsay A. <laflaming@seyfarth.com>; Robert Brennan <rbrennan@brennanlaw.com>; Barton, Eric <EBarton@seyfarth.com>

Subject: RE: Nicolette demand letter to Equifax

Lindsay, In the documents you just sent us in Nicolette, I did not see an ACDV form that we assume you sent to Tesla. Was that an oversight?

Regards,
Robert Bichler
Senior Paralegal

Robert F. Brennan, Esq.
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From: Fleming, Lindsay A. <lafleming@seyfarth.com>
Sent: Thursday, June 17, 2021 2:04 PM
To: Robert Brennan <rbrennan@brennanlaw.com>; Barton, Eric <EBarton@seyfarth.com>
Cc: Robert Bichler <rbichler@brennanlaw.com>
Subject: RE: Nicolette demand letter to Equifax

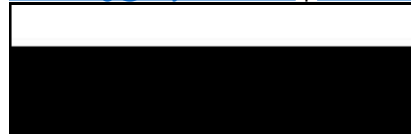
Bob,

Tomorrow is Equifax's deadline to file an answer in the Nicolette case; however, we have settled this one. Can you please file a Notice of Settlement informing the Court of our settlement and requesting that the Court vacate all pending deadlines as to Equifax?

We are still waiting to receive an updated disclosure for Mr. Nicolette. Once I have that, I will send you the settlement agreement and disclosure. In the meantime, Equifax's informal document production is attached for your review. (The password will follow in a separate email.)

Thanks,
Lindsay

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From: Robert Brennan <rbrennan@brennanlaw.com>
Sent: Thursday, May 27, 2021 5:00 PM
To: Barton, Eric <EBarton@seyfarth.com>
Cc: Fleming, Lindsay A. <lafleming@seyfarth.com>; Robert Bichler <rbichler@brennanlaw.com>; Robert Brennan <rbrennan@brennanlaw.com>
Subject: RE: Nicollette demand letter to Equifax

[EXT. Sender]

Mr. Barton, on your representation that the Tesla tradeline will be permanently deleted, and that we will receive the necessary documents for both Nicolette and Pavel, Mr. Pavel accepts the [REDACTED] to settle with EFX only. Pls. forward the release, etc.

Thank you.

Bob Brennan

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From: Barton, Eric <EBarton@seyfarth.com>
Sent: Thursday, May 27, 2021 1:58 PM
To: Robert Brennan <rbrennan@brennanlaw.com>
Cc: Fleming, Lindsay A. <laflaming@seyfarth.com>; Robert Bichler <rbichler@brennanlaw.com>
Subject: RE: Nicollette demand letter to Equifax

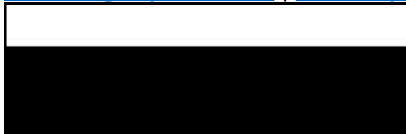
Great -- we'll get you a draft settlement agreement for Mr. Nicollette (consistent with our prior settlements).

As for Mr. Pavel, like the others, Equifax will remove the account from his disclosure, so it won't reappear. Do we have a deal there too?

In terms of the other settlements, I can confirm that we've passed along all fully executed settlements to Equifax and they are processing the checks. I will tell you that those checks are cut in Costa Rica, so it does take some time, but it's being done.

Thanks.

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